

LAFAYETTE & KUMAGAI LLP
 GARY T. LAFAYETTE (State Bar No. 0088666)
 Email: glafayette@lkclaw.com
 AFRICA E. DAVIDSON (State Bar No. 225680)
 Email: adavidson@lkclaw.com
 100 Spear Street, Suite 600
 San Francisco, California 94105
 Telephone: (415) 357-4600
 Facsimile: (415) 357-4605
 Attorneys for Defendants
 PACIFIC GAS AND ELECTRIC COMPANY

IBEW, LOCAL UNION 1245
 JENNIFER MARSTON (State Bar No. 250018)
 Email: JLM6@IBEW1245.com
 30 Orange Tree Circle
 Vacaville, California 95687
 Telephone: (707) 452-2715
 Facsimile: (707) 452-2701
 Attorneys for Defendants
 IBEW, LOCAL UNION 1245

SMITH PATTEN
 SPENCER F. SMITH (State Bar No. 236587)
 DOW W. PATTEN (State Bar No. 135931)
 LAUREN N. KUBOTA (State Bar No. 280333)
 353 Sacramento Street, Suite 1120
 San Francisco, California 94111
 Telephone: (415) 402-0084
 Facsimile: (415) 520-0104
 Attorneys for Plaintiff RICHARD VELOZ

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

RICHARD VELOZ,
 Plaintiff,

v.

PACIFIC GAS & ELECTRIC COMPANY,
 IBEW LOCAL 1245, and DOES 1 through 10,
 Defendants.

CASE NO. 3:12-cv-06309-WHA

**STIPULATED REQUEST TO EXTEND
 DEADLINE TO COMPLETE MEDIATION
 AND [PROPOSED] ORDER**

**[Pursuant to ADR Local Rule 6-5, Civil Local
 Rules 6-2, 7-1, and 7-12]**

Deadline for Mediation: June 5, 2013
 Proposed Deadline: June 14, 2013

STIPULATED REQUEST FOR ORDER TO EXTEND MEDIATION DEADLINE - Case No. 3:12-cv-06309-WHA

1 COMES NOW the parties, represented by their counsel, and request the Court for an order
2 extending the time to conduct and complete the mediation. The above-entitled action was referred to
3 mediation on March 7, 2013 (Case Management Order, #18); hence, the current deadline for
4 mediation is June 5, 2013. All parties support this request to extend the mediation deadline by nine
5 days. The following considerations support this request:
6

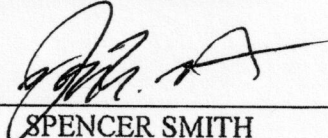
- 7 1. *Unavailability of Mediator and Counsel for Defendant IBEW Local 1245 between May*
8 *18-June 9.* Mediator Mary Shea has informed the parties that she will be out of the
9 country from May 18-26, 2013. Additionally, Jenny Marston, counsel for Defendant
10 IBEW Local 1245, purchased plane tickets in February for a family vacation scheduled
11 for May 31-June 9, 2013.
12
- 13 2. *Necessity of Additional Discovery.* Discovery is proceeding, however, more is necessary
14 in order to complete the mediation. To this end, all sides have exchanged written
15 discovery and the Plaintiff as well as a witnesses for Defendants have been deposed. In
16 addition, the parties have scheduled two additional depositions of PG&E's witnesses,
17 which Plaintiff wishes to occur prior to the mediation. Those depositions have been
18 scheduled for May 30 and June 13, 2013.
19
- 20 3. *Should the Court grant this request, the parties have already set aside June 14, 2013, to*
21 *hold and complete the mediation.* So as to not unnecessarily delay in scheduling the
22 mediation, the parties have agreed to hold mediation on June 14, 2013. Additionally, the
23 parties agree that June 14, 2013, shall be the new deadline for completion of mediation
24 should the Court grant this stipulated request.
25

26 ///

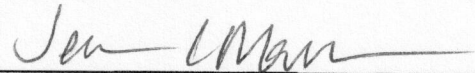
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1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.


2 DATED: May 21, 2013

3 By: 
4 SPENCER SMITH
5 DOW PATTEN
6 SMITH PATTEN
7 Attorneys for Plaintiff RICHARD VELOZ

8 DATED: May 22, 2013


9 By: 
10 JENNY MARSTON
11 IBEW LOCAL UNION 1245
12 Attorney for Defendant
13 IBEW LOCAL UNION 1245

14 DATED: May 21, 2013

15 By: 
16 GARY LAFAYETTE
17 LAFAYETTE & KUMAGAI LLP
18 Attorneys for Defendant
19 PACIFIC GAS & ELECTRIC CO.

20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21 DATED: May 23, 2013.

22 By: 
23 HON. WILLIAM ALSUP
24 UNITED STATES DISTRICT JUDGE